



Town of St. Lucie Village

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November 21, 2014

**FEDERAL EXPRESS,
CERTIFIED MAIL RETURN RECEIPT REQUESTED and**
Via e-mail: AAF_comments@vhb.com

John Winkle, Director
Federal Railroad Administration
1200 New Jersey Avenue, S.E., Room W 38-31
Washington, D.C. 20590

Re: Draft Environmental Impact Statement on All Aboard Florida

Dear Mr. Winkle:

The Town of St. Lucie Village (the Village) appreciates the opportunity to comment on the Draft Environmental Impact Statement (Draft EIS) for the All Aboard Florida (AAF) project. We are very concerned that the impacts to the Village are not adequately addressed in the draft EIS.

The Village is a small town (population 600) that was first settled in 1843. The oldest part of the Village is a National Register Historic District with 33 contributing homes and structures. The 2.6-mile length of the Village is bisected by the Florida East Coast Railway (FECR) right-of-way from approximately mile marker 236.7 through 239.3, adjacent and parallel to the Old Dixie Highway (State Road 605) right-of-way. The Village's predominant land use is single-family residential and this use borders the FECR/Old Dixie Highway right-of-way on either side throughout most of the Village. The oldest home in the Village was built in 1875, 19 years before Henry Flagler built the railroad through what is now St. Lucie Village. Though the Village has coexisted with the railroad for 120 years, the AAF project has the potential to drastically change that.

As designed, the AAF project will provide no benefits for the Village and will have very serious and long-term detrimental impacts that will forever alter the quiet, residential character of the Village and degrade the quality of life for Village residents. These impacts are described in the Town's comments on the draft EIS attached to this letter. The following is a brief summary of these comments:

1. The Level 1 Screening Analysis is inadequate for a project of this magnitude, as it does not address the economic impacts of selecting the FECR corridor for the north-south route between Orlando and West Palm Beach on the coastal cities, towns and counties between Cocoa and West Palm Beach.
2. Safety issues, including at-grade crossings, bicycle and pedestrian safety, trespasser issues, crossing delays and safety considerations for traffic on Old Dixie Highway are not adequately addressed.

John Winkle, Director

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3. The draft EIS does not contain any analysis of the impacts on the Village resulting from locating the triple-track center siding in the Village. The compounded safety, noise, and aesthetic impacts of locating a third track center siding through most of the 2.6-mile length of the Village, in addition to adding a second track through the entire Village, must be addressed in the Final EIS.
4. Economic impacts on the Village, including costs to implement quiet zones, increased periodic maintenance costs, decreased property values, and the potential for increased non-local tax burden are not addressed.
5. Noise impacts on the Village are addressed in a superficial manner and do not take into account the close proximity of residential land uses to the FECR right-of-way. The generic analysis of vibration effects does not take into account the significant potential for increased freight traffic posed by the dual-track system and the impacts of increased vibration on historic homes within the Village.
6. The significant cultural and historic resources within St. Lucie Village, including its National Register Historic District, are not adequately addressed.
7. The effect of other projects to accommodate post-Panamax container shipping on rail traffic in the FECR corridor and the impacts of greatly increased rail traffic in the future are not adequately addressed in the Draft EIS.
8. The mitigation and commitment section of the draft EIS is inadequate. Public health and safety are not addressed, sealed corridor treatment is not considered, and there is no commitment to funding quiet zones.
9. The Draft EIS does not recognize the Town of St. Lucie Village as an incorporated town in discussions of local government entities and coordination with those entities.

The Village is requesting that all of the attached comments on the Draft EIS be competently and objectively addressed in the Final EIS. We are also requesting that a third, independent party review the Draft EIS comments and the manner in which they are addressed in the Final EIS.

Sincerely,



William G. Thiess, Mayor

WGT

Enclosures

cc: Michael Busha, Treasure Coast Regional Planning Council
Richard Gillmor, Treasure Coast Regional League of Cities
Mayor Linda Hudson, Treasure Coast Council of Local Governments

**COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
AND SECTION 4(F) EVALUATION
TOWN OF ST. LUCIE VILLAGE, FLORIDA
NOVEMBER 21, 2014**

Background

In order to accurately assess impacts of the All Aboard Florida (AAF) project on the Town of St. Lucie Village (the Village), it is important to understand the history of the Village, its slow-paced residential character, and the physical configuration of the Village in relation to the Florida East Coast Railway (FECR) right-of-way. The Village is a small (population 600), historic, primarily residential town just north of Fort Pierce that was first settled in 1843. The oldest part of the Village is a National Register Historic District with more than 30 contributing homes and structures. The oldest home in St. Lucie County, the Russell Home, was built in 1875 near the center of this district, 19 years before Henry Flagler built the railroad through what is now St. Lucie Village. The Village has managed to co-exist with the railroad for 120 years, but the AAF project has the potential to drastically change that.

The Village lies between U.S. Highway One and the Indian River Lagoon, immediately north of the City of Fort Pierce. It is over 2.6 miles long in the north-south direction and less than one half mile wide at its widest point. The FECR right-of-way parallels Old Dixie Highway and bisects the Village throughout its length, with mostly residential development closely bordering the railroad tracks on either side (see Exhibit 1, Future Land Use Map, Town of St. Lucie Village). There are six railroad crossings within the Village, four of which offer the only means of access to and from the neighborhoods they serve.

Our understanding is that there are now approximately 14 freight trains passing through the Village daily. The AAF project will add an additional 32 trains per day passing through the town at speeds of up to 110 miles per hour. This represents an increase of more than three times the current number of train passages. The 30% plans for the project show a third set of tracks through nearly the entire length of the Village that will be used as a center siding, where long freight trains will be diverted at greatly reduced speed to allow faster passenger trains to pass. This presents its own set of adverse impacts to the Village, none of which are addressed in the Draft EIS.

The AAF project raises serious concerns for the Village related to safety, cost, noise, traffic delays at crossings, traffic safety on Old Dixie Highway, and decreasing property values in the Village. This project appears to be on a fast track, so these concerns are immediate and must be addressed in the Final EIS. The Village's comments on the Draft EIS are contained in the remainder of this document.

Inadequacy of Level 1 Screening Analysis for Route Alternatives (Section 3.3.1)

The Level 1 Screening Analysis of alternative routes between Orlando and West Palm Beach is superficial and totally inadequate for a project of this magnitude. The only costs considered in the analysis are the costs to AAF to construct the project. There is no consideration given to the costs incurred by all of the coastal communities between Cocoa and West Palm Beach, and these costs are substantial in magnitude and continuing in duration. The FECR route preferred in the Draft EIS will result in increased costs to each city, town and county along the route for constructing quiet zones and reconfiguring traffic patterns to address safety issues and maintain traffic across the FECR right-of-way. In many cases, overpasses may ultimately be necessary to maintain safe connectivity between the east and west sides of the tracks in busy downtown areas or where major highways cross the tracks. There will be the significant and recurring costs for increased periodic maintenance of the at-grade crossings, which already comprise a substantial portion of the annual budget for the Village. Over time, there will be a significant reduction in ad valorem tax revenues for properties in close proximity to the FECR right-of-way. This impact on tax revenues will increase over time as the traffic, safety and noise issues increase with increased rail traffic.

Perhaps more significant in terms of long-term costs to these cities, towns and counties is the strong potential for the project to negatively affect economic development and tourism. Having a dual-track rail system that includes numerous high-speed passenger trains and long freight trains bisecting the downtown areas will change the character of these communities forever and will be a deterrent to business expansion, new business development, and tourism. Many of these communities are still struggling to recover from the recession and are dealing with numerous empty buildings and loss of vitality in the downtown areas. Selecting the FECR route will pose a serious obstacle to revitalizing these areas and attracting business and tourists. It also will have very negative effects on aesthetics and the quality of life in these areas, the value of which cannot be reduced to mere dollars and cents.

The adverse economic impacts of the AAF project on coastal communities between Cocoa and West Palm Beach are significant, they are long-term, and they have the potential for permanent damage to the economic development potential of these communities. Because of this, they should be evaluated by an unbiased party in a present worth analysis over the life of the AAF project. The minimum evaluation period should be 25 years.

It is recognized that there will be benefits to business, commerce, and, tourism in areas outside the Cocoa-to-West Palm Beach north-south corridor. This would be particularly true in the Orlando and Miami areas. However, in the comparison of the four Level 1 screening alternatives, these positive economic effects do not offset any of the negative economic effects of the FECR route alternative on coastal communities because they are the same for all four alternatives. The FECR route stands alone as the alternative with significant, detrimental, and lasting impacts on the coastal cities, towns, and counties of east central Florida resulting primarily from noise, safety, traffic and economic impacts associated with the 129-mile, high-speed rail corridor with

159 at-grade crossings bisecting their communities. A western Orlando-to-West Palm Beach route would most likely receive wide public acceptance and support, which would present potential opportunities for private-public partnerships to address the higher costs.

Safety Issues (Section 4.4.4)

Crossing Safety. The Village is very concerned that addition of 32 high-speed trains travelling at speeds of up to 110 mph will constitute a safety hazard at the six Village at-grade crossings. According to the Federal Railroad Administration (FRA) database, there have been 43 "crossing incidents" in the four counties between Cocoa and West Palm Beach and more than 30 trespasser fatalities over the past 15 years. While we recognize that the proposed safety improvements will offset some of the increased risk associated with more frequent and faster trains, we remain very concerned that electrical/mechanical malfunctions of the safety equipment, human error in operations, trespassers' determination to "beat the system", or driver/vehicle malfunctions will result in a much higher risk of accidents at crossings. All recommendations by the Federal Railroad Administration, including implementation of Vehicle Presence Detection systems, should be implemented. The risk of train derailment due to the mix of high-speed commuter trains with lower-speed freight trains, combined with the numerous at-grade crossings, must be addressed in the Final EIS.

Pedestrian and Bicycle Safety at Crossings. The FECR corridor bisects the Village throughout its 2.6-mile length. Residential lots are adjacent to the FECR corridor and Old Dixie Highway right-of-way on either side, with the only notable exception being the 70-acre St. Lucie Village Heritage Preserve between Milton and Torpey Roads. There is pedestrian and bicycle traffic throughout this area. The safe passage of pedestrian and bicycle traffic through the crossings is not addressed in the Draft EIS. Of particular concern is the fact that the crossing streets at Old Dixie Highway are school bus stops, where school children of all ages are picked up and dropped off daily throughout the school year.

Trespasser Issues. The "Onsite Engineering Field Report - Part 1" noted that "Trespassing is epidemic along this corridor." The Village is no exception to this observation, as both local and itinerant pedestrian, bicycle and off-road sport vehicle traffic is commonly observed on or near the tracks within the Village. This is not addressed in the Draft EIS. If fencing or other barriers to restrict access are to be used to address the trespassing issue, maintenance and aesthetic issues associated with those barriers needs to be addressed in the Final EIS.

Crossing Delays. Though the crossing time for the AAF trains should be shorter than that for the current freight trains, the more than three times increase in the number of trains passing through the Village will significantly increase the number of daily road closures at Village crossings. In addition to being a nuisance and potential safety hazard for residents entering and leaving their neighborhoods, it will cause much more frequent delays for emergency vehicles. Seconds count when responding to fires, health emergencies, or law enforcement issues, and this presents an increased risk to the health, safety, and property of residents east of the FECR corridor.

Old Dixie Highway Traffic Impacts. Constructing a second track west of the existing track will move the crossing gates west and will restrict or eliminate vehicle storage west of the crossing gates on the crossing streets, outside the travel lanes of Old Dixie Highway. This condition will require north-bound and south-bound traffic on Old Dixie Highway turning east into the side streets to stop in the travel lanes until the crossing gates are raised. Old Dixie Highway is a heavily-travelled road, used for local traffic and as an alternate to U.S.1 for traffic between Fort Pierce and Vero Beach. There are frequent vehicle accidents on Old Dixie Highway and increasing the occurrence of stopped vehicles in the travel lanes will increase the potential for accidents and degrade the level of service. This issue is not addressed in the Draft EIS. This impact is even more severe if the triple-track section remains in its current location, as discussed below.

Triple Track Center Siding in North St. Lucie County (Section 3.3.3.3 and Appendix 3.4-B4)

The project as designed includes a third track beginning just north of St. Lucie Lane near the south end of the Village and extending about five miles throughout most of the Village and into Indian River County. AAF officials have indicated that the triple-track segment passes through nine at-grade crossings, four within the Village and five in northern St. Lucie and southern Indian River County. The stated purpose of this third track is to divert freight trains into a "center siding" to allow the faster AAF passenger trains to pass. While AAF personnel have stated that the intention is for the freight trains to maintain as much speed as possible as they are diverted through the siding and move them out of the siding as quickly as possible, they did state in meetings with Village officials that they could not rule out very slow passages through the siding, or even an occasional stopped freight train in the siding. This presents a huge problem for the Village. The northern four of the six grade crossings in the Village fall within this five-mile triple track section and the two southern ones will be impacted to a lesser extent by freight trains slowing down to enter the siding, or getting up to speed to exit the siding. The three northernmost Village crossings are the only points of access into those neighborhoods from Old Dixie Highway, as shown in Exhibits 2A, 2B and 2C. Extended delays at these crossings are bound to happen and they will present life safety issues, in addition to nuisance delays for residents. Emergency fire/rescue and law enforcement vehicles may face unacceptably long delays for a very slow or stopped train, losing valuable time to respond to a medical emergency, fire, or law enforcement emergency where delays could result in loss of life or property.

In our review of the Draft EIS, the Draft EIS appendices, and 30% crossing plans, we have not found definitive design information on the turnouts and crossovers that will be used to enter and leave the center siding. Based on the drawing in Appendix 3.3-B4, they do not appear to be designed for high entry and exit speeds. The Final EIS should address the design speed for these transitions to the center siding.

The third set of tracks will also require placement of the crossing gates even further to the west than at the dual-track crossings, practically eliminating all vehicle storage in the crossing streets when the gates are down. This will force all north and south-bound traffic on Old Dixie Highway

that intends to turn east onto the side streets to stop in the travel lanes until the gates are raised, possibly for an extended period when a freight train is passing very slowly through the siding or even stopped. Old Dixie Highway is a heavily-travelled county road that in addition to handling local traffic, functions as a frequently-use alternative to U.S.1 for traffic between Fort Pierce and Vero Beach. There have been many accidents on this road within the Village over the years. Having traffic stopped in both travel lanes on a regular basis, even if for a short time when the center siding is not being used, will create an unsafe condition and degraded level of service for this road.

Other significant impacts of the third track through most of the Village include the additional, extended noise of trains slowing down or stopping in the siding and again when they start gaining speed to leave the siding. For the many homes in close proximity to the triple track section, it will sound as if they are in an industrial "train yard", rather than the peaceful neighborhood they once knew with the occasional passage of freight trains. The triple-track center siding throughout most of the Village will also impact the visual aesthetics of the area and add significantly to the devaluation of property within the Village that will occur with the AAF project.

Given the statements above, it is particularly disturbing that the Draft EIS contains no analysis of the impact of the third track on the Village. In fact, the EIS simply states that the triple track is going to be constructed and lists locations. That list doesn't even include St. Lucie County (although a third track is shown by Appendix 3.3-B4 to be in the Village which is in St. Lucie County). There is absolutely no analysis of the impact in this section; it is simply stated as a fact. Also, the third track is not addressed in Section 4.4.4, the section on existing and proposed conditions with respect to health and safety of the residents and communities. It is also not referenced in Section 5.4.4, the section on proposed conditions with respect to the health and safety of residents and communities. It is not even considered in the analysis of traffic delays along the N-S Corridor at pages 5-11 through 5-13. The Draft EIS does not include any analysis of alternative locations to those reflected in Appendix 3.3.B4 and this is a serious omission.

Considering the extensive impacts throughout the Village created by the current location of the triple-track center siding, alternative locations for the siding should be given serious consideration if the FECR route is ultimately selected. Other sites with apparently lesser impacts have been identified. One five-mile stretch of FECR track north of Vero in an area of low population density impacts only two crossings. Sites north and south of Midway Road might not impact any crossings. Impacts of the triple-track center siding on the Village will undoubtedly get worse with the future increase in freight traffic spurred by increased shipping into Port Everglades and Miami upon completion of the Panama Canal widening project. The current location is absolutely unacceptable to the Village for the reasons stated above, coupled with our strong (and most likely accurate) feeling that there would be little, if any, consideration for the residential nature of the triple track location in its use to manage freight and passenger train traffic in the future when the rails are much busier.

Economic Impacts

Quiet Zone Costs. In order for the Village to maintain as much of its peaceful, residential character as possible in the event the FECR route is selected, implementation of quiet zones throughout the Village would be necessary. It is still not clear what the initial and recurring cost of these quiet zones would be, nor is it clear how they would be funded. Since the AAF project offers no benefits to the Village and all beneficial aspects of the project are realized by either AAF or communities well north or south of the Village, the cost of implementing quiet zones should be borne by AAF or other outside sources.

Increased Periodic Crossing Maintenance Costs. There are five publically-maintained crossings within the Village and the Village currently has financial responsibility for maintaining all or half of four of them (100% of Torpey Road, and 50% of Rouse Road, Chamberlin Boulevard, and St. Lucie Lane). This past year, the Village was assessed over \$86,000 for maintenance on the Torpey Road crossing, which represents 24 percent of the Village's entire fiscal year 2014 budget. The cost of this periodic maintenance will increase substantially if this project is constructed in the FECR corridor due to the greater number of tracks and the increased cost of maintaining additional safety features. If the triple-track section remains at the Chamberlin Boulevard, Milton Road, Torpey Road and Rouse Road crossings, the added cost will be ever greater. The magnitude of these costs has not been identified, but they appear certain to be significant and most likely tax increases will be required to fund the additional cost. The Final EIS must address these costs.

Decrease in Property Values. Studies in other areas where high-speed rail projects have been constructed showed a significant decline in residential property values. A draft report entitled "The Effect of Rail Transit on Property Values: A Summary of Studies", prepared for the NEORail II project in Cleveland Ohio in 2001 referenced studies that showed declines in residential property values of 5-20%, with the magnitude of the impact generally decreasing with distance from the tracks. One study documented a loss of 20% for residential properties located within 400 feet of the tracks and another documented property value decreases one half mile from rail lines. Of the 300 homes in the Village, approximately 160 are within 400 feet of the tracks and all are within 1,500 feet of the tracks. Granted, there is already a rail line passing through the Village, but the proposed double and triple tracking with three times the train traffic and mixture of high-speed and slower freight trains will certainly impact residential property values. Decreasing property values will affect all homeowners and will also result in decreased ad valorem tax revenues for the Village. The magnitude of these impacts, based on the numerous studies available in other areas, must be documented in the Final EIS.

Potential Non-local Tax Burden. The proposed \$1.6 billion, federally-guaranteed Railroad Rehabilitation and Improvement Financing (RRIF) loan for the project has significant potential to put an added financial burden on U.S taxpayers. Passenger rail projects have consistently demonstrated an inability to fully pay debt service for the project from rider revenues. Relevant examples include the reported \$58 million Tri-Rail loss on the Miami-to-Palm Beach route in 2013 and the \$88 million Amtrak loss on the Miami-to-Orlando route in the same year. A detailed

financial plan for the AAF project was not made available for public inspection, but it would seem like there is a significant potential for similar losses with the rail passenger aspect of the AAF project. Use of Private Activity Bonds (PABs) in conjunction with or in lieu of the RRIF loan would exempt the bond buyers from paying income tax on profits from the bonds, which would result in a loss of federal tax revenue in comparison with private financing alternatives for the project. The Government Accountability Office (GAO) should conduct a financial analysis of the AAF plan examining the potential risks and costs to taxpayers, the possible interest rates that would be appropriate for the RRIF loan, and whether or not private financing could be sustained for this project.

Noise and Vibration Impacts (Section 5.2.2)

Train Horns and Crossing Audible Warning Signals. The more than three times increase in passages of trains through the Village resulting from the AAF project will significantly increase the noise impacts on Village residents. All homes in the Village are within 1,500 feet of the FECR right-of-way and can clearly hear the train horns. Switching to fixed horns at the crossings may reduce noise impacts for some residents, but noise impacts will still be significant due to the relatively close spacing of the six crossings. The magnitude of the increase in train horn and crossing audible signal "events" poses a serious threat to the peace and tranquility of the Village. Implementation of quiet zones throughout the Village would presumably mitigate some of these noise impacts. However, the cost of establishing the quiet zones is unknown at this point and the initial and recurring costs we have seen in various reports appear to be beyond the financial means of the Village. Constructing a dual-track railway through the north-south corridor will have the secondary impact of increasing freight rail traffic in the future, and this will have a significant impact on future noise levels in the Village. The Final EIS should specifically address all of these noise impacts on the Village, as they are significant and have the potential to seriously degrade the quality of life in this historic residential area.

Additionally, the Village is not satisfied that the generic analysis of vibration effects in the Draft EIS adequately addresses the long-term impacts of increased vibration on historic homes and structures in the Village, many of which are multi-story and well over 100 years old. Of particular concern is the potential that the dual-track railway has for greatly increasing freight traffic through the Village in the future and the vibration effects of the heavier, longer freight trains added to the frequent passage of passenger trains. The Final EIS should specifically address the secondary effect of increased freight traffic and the vibration effect on historic structures in the Village.

Noise of Train Passage. While we recognize that the AAF trains are lighter, quieter and pass through much faster, they still will constitute a significant increase in noise pollution for homes in close proximity to the tracks. This is particularly true in cooler seasons when residents leave their windows open. It appears there is little that can be done to mitigate this impact, other than move the north-south corridor to a more western location.

Cultural Resources and Historic Resources (Section 5.4.5)

Other than the listing of Fort Capron as an archaeological site in Table 4.4.5-14, there is no mention in the Draft EIS of the significant cultural and historic resources within the Village. The St. Lucie Village Historic District is on the National Register and is comprised of 33 contributing homes and structures. Many of the residential lots on which these historic homes are located abut the FECR right-of-way. The St. Lucie Village National Register Historic District will be degraded by the AAF project as a result of the detrimental impacts described in this document.

In addition to Fort Capron and the Village's National Register Historic District, there are Pre-Columbian and pre-historic Ais middens and burial mounds within the Village. There is also a historic cemetery (Payne-Jones Cemetery) west of the FECR right-of-way, just south of Olsen Avenue. Section 5.4.5 of the Draft EIS states that the Project would have no direct or indirect effects (noise, vibration or change in setting) on the historic resources located adjacent to the N-S Corridor. However, in a May 30, 2014 e-mail from Ginny Jones of the State Historic preservation Office, she states that "Fort Capron does fall within the APE, that it is eligible for listing on the National Register of Historic Places, and that the impacts of the proposed project on the site have not yet been assessed." Also, Maps 52 and 53 of Appendix 4.4.5 B3, Cultural Resources, approximate but do not accurately depict the Third Seminole War U.S. Army Fort Capron's (1850-1859) area. The Final EIS must properly address impacts of the AAF project on the significant cultural and historic resources of the Village.

Mitigation (Section 7)

Section 7 of the draft EIS addresses mitigation and commitments, but only in very general terms and with little specific mitigation. This section does not even contain a subsection on public health and safety. Clearly, the grade crossings are potentially dangerous and sealed corridor treatment would be merited (per the "Outside Engineering Field Report – Part 1"), but that is not even considered.

Further, at subsection 7.2.4, in describing noise and vibration mitigation, the only specific mitigation is a commitment to the pole-mounted horns. There is a reference to quiet zones at the bottom of page 7-5; however, the note is that they are being considered by "affected communities". AAF should be mitigating the consequences of its project, instead of placing the burden on the public and this should be addressed in the Final EIS. It is also of note, relative to specific impacts to this community, that there is no mitigation or commitment pertaining to the third track which is planned for the Village. This very definitely needs to be addressed in the Final EIS.

Effect of Other Projects to Accommodate Post-Panamax Container Shipping on Rail Traffic in the FECR Corridor

The dual track system that will be installed with the AAF project will increase the capacity of the FECR rail corridor to move freight. Table 3.3-1 indicates that the average number of trains per day will increase from 14 in 2013 to 20 in 2016 and is projected to increase at 3% annually after 2016. The Draft EIS text in Section 5.1.3.2 (page 5-17) indicates that this projected increase is due to the timing of completing expansion of the Panama Canal to handle the larger post-Panamax container ships. It is also obviously tied to completion of port projects in Miami and Port Everglades to accept these larger container ships and the need to move freight north. At a 3% growth rate in the number of trains beyond 2016, there would be 42 freight trains passing through the FECR corridor in 2041, 25 years after completion of the Panama Canal expansion project. These trains would be sharing the dual-track system with 32 high-speed passenger trains. The Draft EIS does not address this extremely high level of mixed freight and high speed passenger rail traffic in the FECR corridor that is projected to occur in the future. All of the impacts described in this document, particularly those related to railway and crossing safety, crossing delays, noise, vibration, declining property values and recurring maintenance costs incurred by local governments would be much more severe at this future date. The Draft EIS does not address impacts on cities, towns and counties in the north-south corridor at these future projected train traffic levels. The Final EIS should provide an accurate and detailed assessment of impacts in the north-south FECR corridor at these projected future train traffic levels.

Exclusion of the Town of St. Lucie Village in Discussions of Local Government Entities

Other than references to Fort Capron as a historic site in Table 4.4.5-14 and St. Lucie Village Heritage Park (now St. Lucie Village Heritage Preserve) in Table 4.4.6-2, there is no mention of the Town of St. Lucie Village as an affected local government in the draft EIS document. Specific omissions include:

- On PDF page 134 (4-3), the discussion of existing land uses references incorporated municipalities that AAF goes through, but doesn't reference St. Lucie Village.
- Table 4.1.1-1 (pg. 135, 4-4) lists land use plans of various counties and municipalities, but not the Village.
- At page 234 (4-103), there is another reference to passing through numerous incorporated municipalities - not including St. Lucie Village.
- On page 256 (4-125), local government contacts concerning locally designated cultural resources are listed and there is no contact for St. Lucie Village.

Map 1.4 2020 Future Land Use Map, Town of St. Lucie Village

EXHIBIT 1

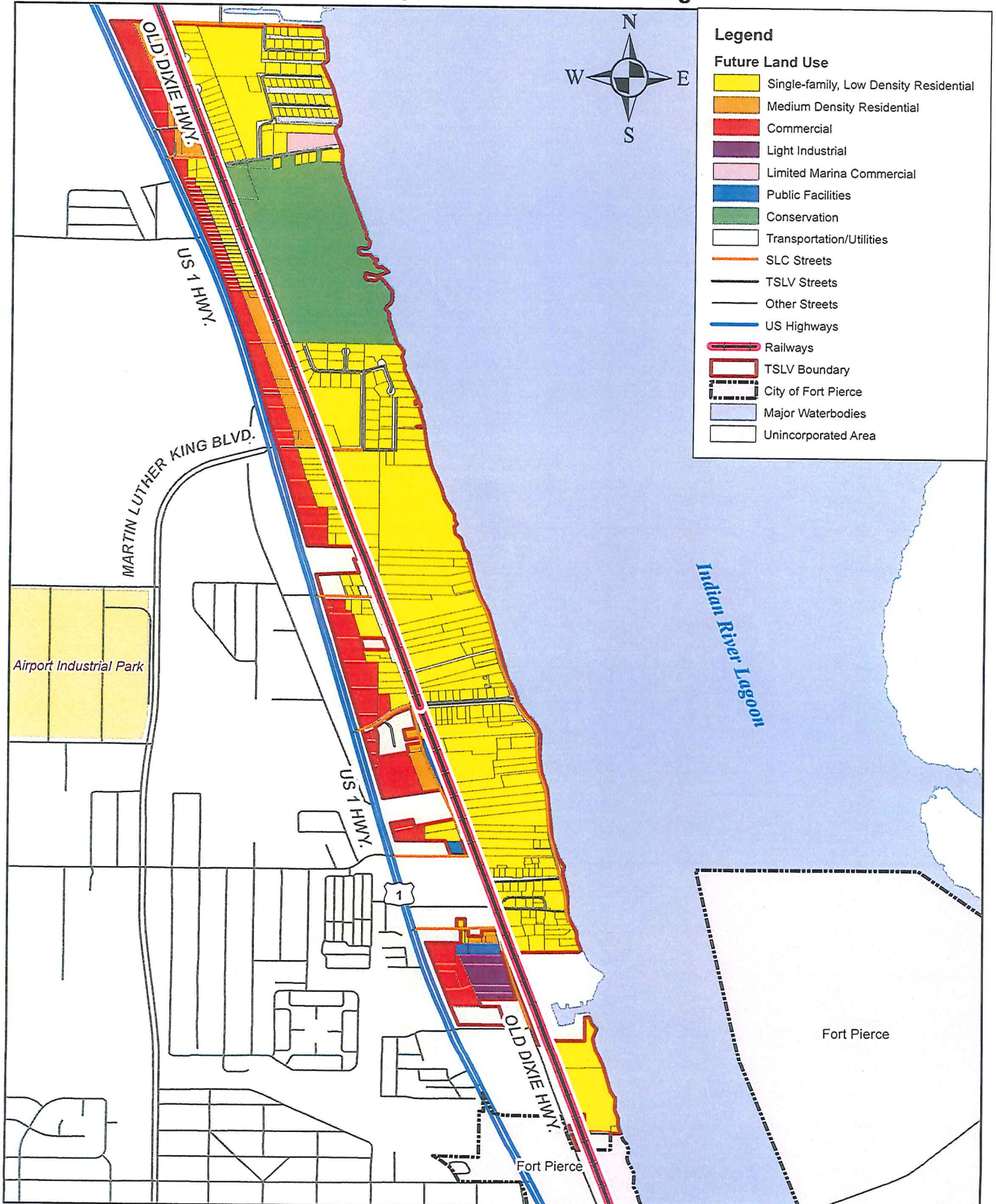


EXHIBIT 2A



EXHIBIT 2B

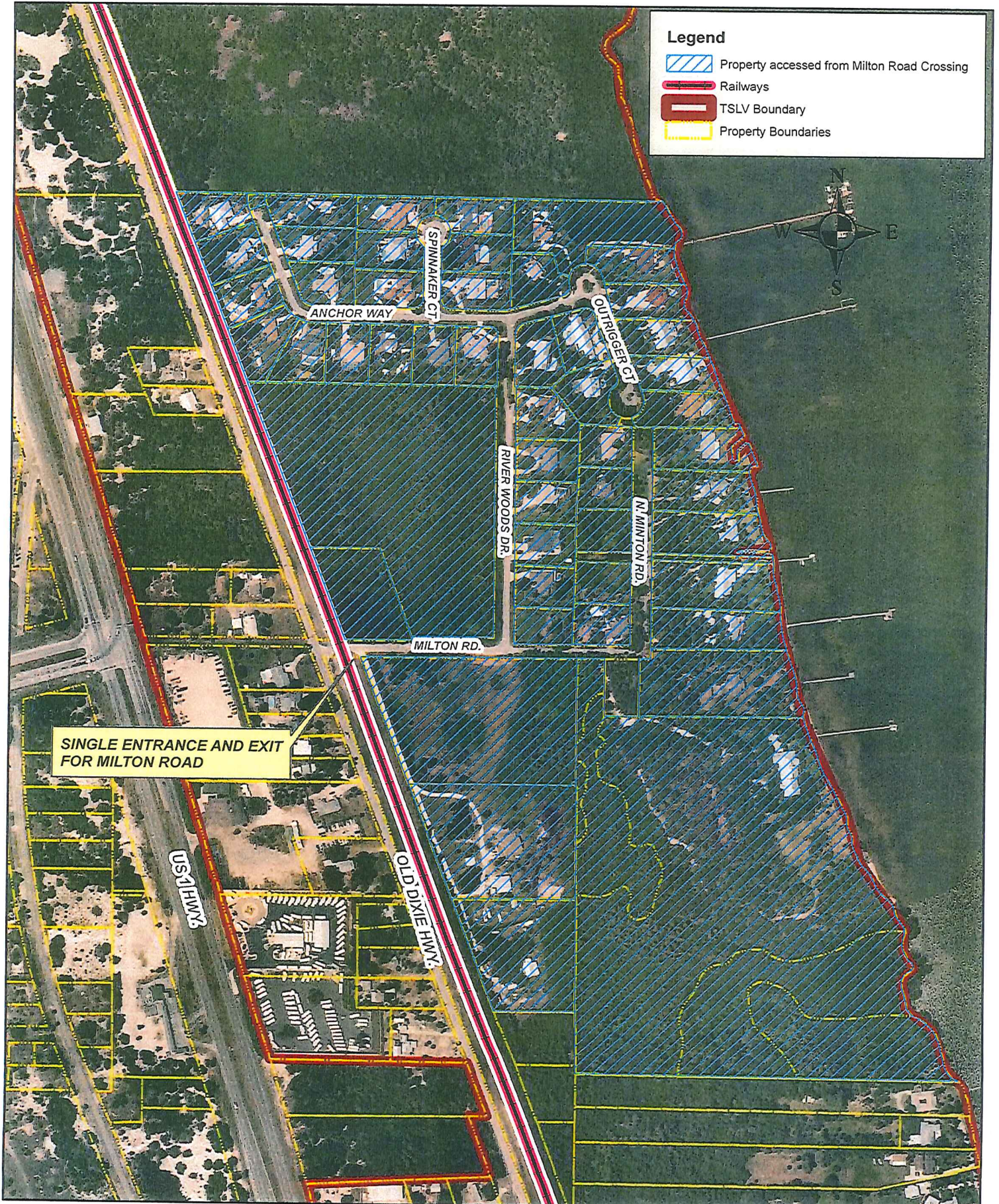


EXHIBIT 2C

